

DRAWING AMENDMENTS

The attached sheet of drawings includes changes to Fig. 1. This sheet, which includes Fig. 1, replaces the original sheet including Fig. 1. In Fig. 1, the label "PRIOR ART" has been added.

Attachments: One Replacement Sheet
 One Annotated Sheet Showing Changes

REMARKS

Reconsideration of the application is requested.

Claims 1-12 and 16-29 are now in the application. Claims 1-12 and 16-29 are subject to examination. Claims 1, 2, 12, 21, 23, and 24 have been amended. Claims 13-15 have been canceled to facilitate prosecution of the instant application.

Under the heading "Drawings" on page 2 of the above-identified Office Action, the Examiner objected to the drawings.

The Examiner suggested labeling Fig. 1 as prior art and that change has been made.

Under the heading "Claim Rejections – 35 USC § 112" on page 4 of the above-identified Office Action, claims 23, 24, and 29 have been rejected as being indefinite under 35 U.S.C. § 112, second paragraph.

With regard to claim 23, the Examiner stated that it is not known how the control signal is operationally segregated.

The term "operationally" has been deleted from the claim. Page 10, lines 8-14 describes the "segregation". Fig. 3 shows that the private addressing scheme

304 (See top diagram) is “segregated” or “isolated” from other portions of the public addressing scheme 306 (See middle diagram).

The bottom diagram of Fig. 3 shows the specific fields of the private addressing scheme, and page 10, lines 27-35 describes that the fields are isolated from the AESA addressing scheme used by the ATM infrastructure.

It is believed that claim 23 defines the intended limitations with sufficient specificity.

Claim 24 now specifies that the control signal is inserted into the virtual addressing overlay when the control signal is inserted into the private field of the second protocol. Support for the changes may be found on page 10, lines 8-35 of the specification and Fig. 3 of the instant application.

With regard to claim 29, antecedent basis for “the addressing scheme” can be found in line 7 of amended claim 1.

It is accordingly believed that the specification and the claims meet the requirements of 35 U.S.C. § 112, second paragraph. The above-noted changes to the claims are provided solely for clarification or cosmetic reasons. The changes are neither provided for overcoming the prior art nor do they narrow the scope of the claim for any reason related to the statutory requirements for a patent.

Under the heading "Claim Rejections – 35 USC § 102" on page 4 of the above-identified Office Action, claims 1-18, 21, 26, and 28 have been rejected as being fully anticipated by International Publication WO 01/13599 A2 to Subbiah under 35 U.S.C. § 102.

Claims 1, 12, and 21 have been amended to better define the invention. Support for the changes can be found by referring to the specification at page 10, line 16 through page 11, line 19 and to Fig. 3.

Claim 2 has been amended to specify that the step of mapping maps a first portion of the overlay area with dummy data to isolate the overlay area from the ATM addressing scheme and maps a next portion of the overlay area to an end-point IP address.

Support for the changes can be found by referring to the specification at page 10, lines 27-35 and to Fig. 3.

Claim 1, for example, defines a method for signaling a bearer connection coupled to a telecommunications network, wherein the telecommunications network employs a first protocol and the bearer connection employs a second protocol, the method comprising the steps of:

mapping at least a portion of the first protocol to the second protocol by mapping session description protocol parameters to control Voice over ATM connections including an ATM addressing scheme having an E.164 address, Routing domain, and Area fields; and

inserting a first signal of the first protocol into a second signal of the second protocol according to the mapping, wherein the inserted first signal is employed in the control of the bearer connection;

the step of mapping redefining the E.164 address, the Routing Domain, and the Area fields, as an overlay area, into a private IP/ATM address fitting bit-wise within previously defined fields, thereby abiding by addressing rules of the ATM addressing scheme.

Claims 12 and 21 have limitations similar to those in claim 1 and the arguments provided below in regard to claim 1 are also applicable to claims 12 and 21.

Subbiah does not teach anything detailed or specific about how to convert protocols and does not teach the specific limitations of the mapping defined in claims 1, 12, or 21.

Subbiah merely mentions a conversion without teaching anything specific about how such a conversion could be performed. More importantly, the reference seems to relate to a 1-to-1 conversion of the two protocols. In other words, it

does not disclose converting control codes of a protocol so that it fits seamlessly into the second protocol (or vice versa).

Claims 1, 12, and 21 specify just that, namely using the E.164, Routing Domain and Area Fields of the ATM protocol to insert a private IP/ATM address. For that matter, the claimed invention inserts the IP/ATM address so that it fits bit-wise into these fields.

For example, claim 1 specifies: the step of mapping redefining the E.164 address, the Routing Domain, and the Area fields, as an overlay area, into a private IP/ATM address fitting bit-wise within previously defined fields, thereby abiding by addressing rules of the ATM addressing scheme.

Applicants assert that it is not well known to use SDP to convert IP to ATM signals. Applicants also point out that it requires a certain amount of understanding to know which fields to manipulate without crashing the ATM system. Since neither Subbiah nor any other reference demonstrates how such a conversion could be accomplished without affecting the resident ATM system, applicants assert that invention as defined by claims 1, 12, and 21 is not obvious over the disclosure of Subbiah.

Under the heading "Claim Rejections – 35 USC § 103" on page 7 of the above-identified Office Action, claims 19 and 20 have been rejected as being obvious over International Publication WO 01/13599 A2 to Subbiah in view of Published

U.S. Patent Application No. 2003/0112761 to Sen under 35 U.S.C. § 103.

Applicants respectfully traverse.

Even if there were a suggestion to combine the teachings in the references for some reason, the invention as defined by claims 19 and 20 would not have been obtained for the reasons specified above with regard to the teaching of Subbiah.

Under the heading "Claim Rejections – 35 USC § 103" on page 8 of the above-identified Office Action, claims 22 and 27 have been rejected as being obvious International Publication WO 01/13599 A2 to Subbiah in view of Published U.S. Patent Application No. 2004/0022250 to Chen et al. under 35 U.S.C. § 103.

Applicants respectfully traverse.

Even if there were a suggestion to combine the teachings in the references for some reason, the invention as defined by claims 22 and 27 would not have been obtained for the reasons specified above with regard to the teaching of Subbiah.

It is accordingly believed to be clear that none of the references, whether taken alone or in any combination, either show or suggest the features of claims 1, 12, or 21. Claims 1, 12, and 21 are, therefore, believed to be patentable over the art. The dependent claims are believed to be patentable as well because they all are ultimately dependent on claim 1, 12, or 21.

In view of the foregoing, reconsideration and allowance of claims 1-12 and 16-29 are solicited.

In the event the Examiner should still find any of the claims to be unpatentable, counsel would appreciate receiving a telephone call so that, if possible, patentable language can be worked out.

Please charge any fees that might be due with respect to Sections 1.16 and 1.17 to the Deposit Account of Lerner Greenberg Stermer LLP, No. 12-1099.

Respectfully submitted,

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MPW:cgm

February 13, 2008

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